

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA**

DUANE & VIRGINIA LANIER TRUST,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

SANDRIDGE MISSISSIPPIAN TRUST I,
et al.,

Defendants.

Case No. 15-cv-00634-G

**JOINT STIPULATION AND MOTION TO STAY OUTSTANDING MOTIONS
AND DEADLINES AS TO DEFENDANT TOM L. WARD AND TO SET DATE
FOR PRELIMINARY SETTLEMENT APPROVAL MOTION**

Defendant Tom L. Ward (“Mr. Ward”) and Lead Plaintiffs Ivan Nibur, Deborah Rath, Jase Luna, Matthew Willenbacher, Reed Romine, and the Duane & Virginia Lanier Trust (“Lead Plaintiffs”), by and through their undersigned counsel, submit the following stipulation and jointly move the Court to stay all pending motions and outstanding case deadlines applicable to Mr. Ward, and to set a date for Lead Plaintiffs to file a motion for preliminary approval of a proposed settlement agreement between Mr. Ward and Lead Plaintiffs (together, the “Parties”).

STIPULATION AND JOINT MOTION

WHEREAS, on November 11, 2016, Lead Plaintiffs filed a Consolidated Amended Complaint for Violations of the Federal Securities Laws (ECF No. 78);

WHEREAS, on February 15, 2018, Lead Plaintiffs filed a Motion for Class Certification, Appointment of Class Representative, and Appointment of Class Counsel (ECF No. 170) (the “Motion for Class Certification”);

WHEREAS, on September 6, 2019, the Court conducted a hearing on Lead Plaintiffs’ Motion for Class Certification;

WHEREAS, pending before the Court are numerous Outstanding Motions, as defined in the Court’s Twelfth Amended Scheduling Order (ECF No. 432), including, *inter alia*, the Motion for Class Certification; Mr. Ward’s Motion for Summary Judgment (ECF No. 373); Defendants’ Motion for Reconsideration Under Rule 54(b) (ECF No. 361); and multiple *Daubert* motions to exclude expert testimony (ECF Nos. 365, 367, 368);

WHEREAS, the Parties participated in an in-person mediation with Judge Layn

R. Phillips on December 13, 2019, and continued settlement discussions thereafter;

WHEREAS, the Parties have reached an agreement in principle to settle all claims asserted against Mr. Ward, subject to, among other items, definitive documentation and the Court's approval;

WHEREAS, the Parties are continuing to formalize the final terms of the settlement;

NOW THEREFORE, MR. WARD AND LEAD PLAINTIFFS HEREBY STIPULATE AND MOVE THE COURT TO ISSUE THE FOLLOWING ORDER:

1. Mr. Ward's motion for summary judgment, and all other Outstanding Motions and pending deadlines with respect to Mr. Ward, are stayed;
2. Lead Plaintiffs will move for preliminary approval of the settlement on or before September 1, 2021 or, if unable to do so by that date, Lead Plaintiffs will file a further stipulation requesting additional time to seek preliminary settlement approval.

IT IS SO STIPULATED.

Dated: June 7, 2021

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